Reply Comments about ET Docket 03-104 submitted by NTIA June 4

As a licensed Amateur Radio Operator, providing public service and emergency communications, I am very concerned about the integrety of the HF spectrum that is being wastefully proposed to be destryed by Access BPL. I consider HF BPL an old technology that offers only limited performance with high risk of interference. The Manassas, VA BPL system is only offering 300Kbps service.

1. I agree with NTIA that BPL providers should proactively address all interference to licensed users. This includes initial design of the BPL equipment to swiftly remedy any interference complaints.
2. It is fairly easy to see the politically motivated shift by NTIA from interference prevention to simpler spectrum management practices. The FCC must stick to it's intended charter to prevent interference rather than figure out how to fix problems after the fact.
3. Existing power line noise complaints have not been dealt with swiftly by the Utilities. "Fixing" the power line noise to make BPL work in no way guarantees that the Utilities will be more motivated to address interference after BPL is installed.
4. I agree with NTIA that BPL providers must be strictly limited to Part 15 emissions or less. A BPL provider running the maximum allowed emission would not feel obligated to reduce power to reduce interference to licensed users. Particularly since Amateur Radio is funded only by personal funds, and low level signals with simple antennas are frequently used, no level of interference should be allowed.
5. NTIA is proposing a frequency coordination process. I believe that there are enough Amateur, commercial, shortwave broadcast, and government users that if they were all properly notched out, there would not be sufficient bandwidth for BPL to make it viable.
6. NTIA only proposes coordination areas, excluded frequency bands, and exclusion zones for the Federal Government radio receivers. This is insufficient. BPL being an unlicensed Part 15 radiator must design for and ensure that there is no interference to any licensed user, not just Federal users.
7. Today's chip sets are designed for about 20Mbps when operating in the 2-25 MHz range. Certainly tomorrow's planned 100 Mbps chip sets will need to stay within the proposed 2-80 MHz range.
8. I agree with NTIA on the use of a comprehensive test of peak radiated emissions.
9. I agree with the NTIA that BPL providers must be capable of being quickly shut down and/or having their frequency usage adjusted upon the receipt of interference complaints. I disagree that shutdown should only be a last resort. If interference is present, shutdown should occur until a remedy is in place. Interference should not be allowed to continue while a solution is being slowly considered.
10. I agree with NTIA that a readily identifiable code signal at a known emission level and consistent modulation type should be broadcast from the BPL system so that it can be easily identified. Although a published database of all devices may not be needed, the coded signal should easily identify the manufacturer and BPL provider names and local contact information that should be

published.
11. I agree with NTIA that certification should be performed by the operator because the configuration and conditions of the power lines are not known to the manufacturer.
12. I agree with NTIA that all interference provisions should be codified and not left as guidelines that could be misinterpreted, abused, and hard to enforce.
13. I strongly disagree with NTIA that the FCC should proceed immediately to rulemaking and leave the critical interference measurement rules for later action. The BPL proponents want to avoid all interference issues and will lobby hard to water down the technical requirements once they are authorized to provide service. The BPL providers have already asked for a multi-year delay in implementing chip sets that fully comply with new FCC interference mitigation rules. This is several years of illegal interference, with no recourse by licensed users. This is totally unacceptable and is not in line with the charter of the FCC to manage the spectrum.
14. I agree with NTIA that Access BPL is sufficiently different from localized point source Part 15 users, that Access BPL should have it’s own sub-part rules to distinguish it as the intentional radiator that it is.